

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

<b>Frederick D. Shepherd, Jr.,</b>	)	<b>C.A. No.: 8:15-cv-04337-MGL</b>
	)	
<b>vs.</b>	)	<b>PLAINTIFF'S RESPONSES TO</b>
	)	<b>LOCAL RULE 26.01</b>
<b>Community First Bank, Richard D.,</b>	)	
<b>Burleson, Gary V. Thrift, Dr. Larry</b>	)	
<b>S. Bowman, William M. Brown, John</b>	)	
<b>R. Hamrick, James E. Turner, Charles</b>	)	
<b>L. Winchester, and Robert H. Edwards,</b>	)	
_____	)	

The Plaintiffs by and through their attorneys, Covington, Patrick, Hagins, Stern & Lewis, P.A., responds to Local Rule 26.01 Interrogatories, as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER: None**

(B) As to each claim, state whether it should be tried jury or non-jury and why.

**ANSWER: All claims are non-jury as case law illustrates claims under ERISA embody equitable relief.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER: The party submitting their responses is not a publicly owned company.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: The incident complained of in the Complaint occurred within the division and each Defendant is a resident within this division.**

(E) Is this action related in whole or in part to any other matter filed with this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges?

**ANSWER: None**

Respectfully submitted,\

**s/ Douglas F. Patrick**

**s/ Austin F. Watts**

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Greenville, South Carolina